

REMARKS

I. INTRODUCTION

Applicants have amended claim 3. Accordingly, claims 1-33 are presently pending in this application. Applicants respectfully request reconsideration of the application in view of the following arguments.

II. AMENDMENTS TO THE CLAIMS

Applicants have amended claim 3 to change the dependency of the claim and clarify the recitation of the invention. Applicants submit that the amendments does not add any new matter.

III. REJECTION OF CLAIMS 1-2, 4, 6-7, 20 AND 29 UNDER 35 U.S.C. § 103(A)

Claims 1-2, 4, 6-7, 20 and 29 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Williams et al. (U.S. Published Application No. 2003-0055812). Applicants respectfully submit that the rejection of claims 1-2, 4, 6-7, 20 and 29 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

“Patent examiners carry the responsibility of making sure that the standard of patentability enunciated by the Supreme Court and by the Congress is applied in each and every case.” MPEP § 2141 (emphasis in original).

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations.

MPEP § 2143. Applicants submit that the combination of Utsugi et al., Reichwein et al. and Williams et al. does not disclose or suggest all of the limitations set forth in the claims. Further, Applicants submit that there is no suggestion or motivation to combine the teachings of Utsugi et al., Reichwein et al. and Williams et al.

Independent claim 1 recites:

1. A system for processing applications from customers for manufacture of vehicle parts by a manufacturer, comprising:
a first server configured to generate an application interface on a customer client in communication with said first server through a first network and to receive a first completed application for manufacture of a first part of a vehicle from said customer through said customer client using said application interface, said first completed application having information including a first set of information regarding operating conditions of said vehicle, a second set of information defining specifications for said first part, and a third set of information regarding a second part of said vehicle functionally interrelated with said first part of said vehicle.

Applicants respectfully submit that the combination of Utsugi et al., Reichwein et al., and Williams et al. does not disclose a system meeting the above-recited limitations.

Utsugi et al. discloses an order processing system. The Examiner asserts that the system includes a server that generates an application interface on a customer client and that receives a completed application for manufacture of a first part that includes a set of

information relating to a second part functionally interrelated with the first part. Office Action p. 2. Applicants respectfully submit, however, that Utsugi does not expressly or inherently disclose a client-server architecture as recited in independent claim 1. Utsugi et al. discloses a system in which communications between an orderer 3 and an order processor 11 occur over an “International Network System” which appears to be an internal communications network. Communications between the order processor 11 and the manufacturer described as occurring over a WAN (wide area network). Figure 2. Utsugi et al., however, does not disclose the nature of either network. The Examiner simply concludes that “WAN is a network of computers that covers a large geographical distance, thus indicating use of servers.” Office Action p. 2. Applicants respectfully submit, however, that the communication networks disclosed in Utsugi et al. could just as easily be peer to peer networks or another network configuration in which no servers are required. Accordingly, Utsugi et al. do not expressly or inherently disclose a client-server architecture. Applicants further note, for example, that Utsugi et al. states that the communications network between the orderer 3 and order processor 11 (i.e., the one that supposedly directly generates the application interface and receives the completed application) could comprise a facsimile or telephone system. Utsugi et al, para. [0069]. Again, Applicants therefore submit that Utsugi et al. does not expressly or inherently disclose a client-server architecture as recited in claim 1.

Applicants further submit that Utsugi et al. does not disclose or suggest that the completed application includes “third set of information regarding a second part of said vehicle functionally interrelated with said first part of said vehicle.” The Examiner cites paragraph [0135] in Utsugi et al. as disclosing a system meeting this limitation.

Applicants submit, however, that paragraph [0135] at most discloses that the system performs processing operations to group ordered parts. The cited paragraph does not disclose or suggest that the orderer 3 would be providing any information on functionally related parts. For example, it is certainly possible that the orderer 3 simply places an order for a product and that the Utsugi system responds by obtaining and grouping the parts for that product. Contrary to the Examiner's assertion, there is simply no disclosure or suggestion in the cited paragraph regarding the information provided by the orderer 3.

The Examiner acknowledges that Utsugi et al. does not disclose a system in which a completed application for manufacture of a part includes "a second set of information defining specifications for said first part" as recited in claim 1. Office Action p. 2. The Examiner asserts, however, that Williams et al. discloses a system meeting this limitation. Office Action p. 3. Applicants respectfully disagree. Williams et al. provides a parts index where a user can identify "authentic" parts for a vehicle and related information. The customer does not submit an "application" within the language of the claim nor any information "defining specifications" for a part. Of the two supporting paragraphs in Williams et al. identified by the Examiner, only paragraph [0032] even mentions "specifications" ([0092] relates to information about manufacturers as opposed to part specifications). This mention, however, is in the context of information provided to the customer as opposed to being received from the customer. The customer in Williams et al. does not provide any information relating to the parts *whatsoever*. All information is received by the customer in response to a request for information about the part.

Applicants further submit that there is no suggestion or motivation to combine the teachings of Reichwein et al. and Williams et al. with Utsugi et al. In particular, both

Reichwein et al. and Williams et al. comprise non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention.

In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned.

In re Oetiker, 977 F.2d 1443, 24 U.S.P.Q. 2d 1443, 1445 (Fed. Cir. 1992); *see also* In re Clay, 966 F.2d 656, 659, 23 U.S.P.Q.2d 1058, 1060-61 (Fed. Cir. 1992). Applicants' claimed invention relates to ordering of vehicle parts for manufacture. Reichwein et al. is directed to a system for servicing vehicles and other equipment in which a portion of the system enables transmission of data relating to vehicle operating conditions over a network to a service center. The system in Reichwein et al. has nothing to do with parts manufacturing and the information transmitted in the claimed system and in the system of Reichwein et al. would be entirely different. Further, Reichwein et al. is not reasonably pertinent to the problem with which applicants were concerned. Applicants claimed invention is directed to improving efficiency in requests for manufacture of parts. Reichwein et al. is directed towards improved coordination of equipment service operations. Applicants note in this regard that the Examiner's stated motivation for combining the teachings of Reichwein et al. with Utsugi et al. (i.e. "it would help in defining the operating parameters of the equipment and allow a service technician to duplicate the symptoms as well as the operating conditions that cause the symptom to aid in the repair" Office Action p. 3) has nothing whatsoever to do with the ordering of manufactured parts as claimed by Applicants nor with the ordering system provided by Utsugi et al. The system in Utsugi et al. has absolutely nothing to do with servicing parts. Accordingly, Applicants respectfully submit that one of ordinary skill in the art would

have no motivation to modify Utsugi et al. based on the teachings of Reichwein et al. as suggested by the Examiner.

Williams et al. is also not within the field of the invention. As opposed to the orders for manufacture of parts, Williams et al. is directed to a parts index that allows customers or repair shops to identify “authentic” parts for their vehicles and to look up information on the parts. Williams et al. is also not reasonably pertinent to the problem with which Applicants were concerned. While Applicants’ invention is directed towards improved efficiency in orders for manufacture of vehicle parts, Williams et al. is directed towards improved reliability in ordering authentic, already manufactured aftermarket parts. See [0005] through [0010]. Applicants again submit that the Examiner’s stated motivation for combining the teachings of Williams et al. with Utsugi et al. (i.e. “information about the parts specification would allow to quickly cross reference between parts thereby helping the user to accurately access information about authentic parts” Office Action p 3) reflects the non-analogous nature of this art. Obtaining information about authentic parts for use in vehicle repair or reconstruction has nothing whatsoever to do with the ordering of manufactured parts (i.e., original equipment) as claimed by Applicants nor with the ordering system provided by Utsugi et al. Again, the system in Utsugi et al. has absolutely nothing to do with vehicle or equipment servicing. Accordingly, Applicants respectfully submit that one of ordinary skill in the art would have no motivation to modify Utsugi et al. based on the teachings of Williams et al. as suggested by the Examiner.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited independent claim 1 and because there is no

suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claim 1 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicants request that the rejection of claims 1 under 35 U.S.C. § 103(a) be withdrawn. Further, at least because each of claims 2, 4, 6-7, ,20 and 29 depend from independent claim 1, Applicants submit that the rejection of claims 2, 4, 6-7, 20 and 29 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants further submit that claims 2, 4, 6-7, 20 and 29 recite patentable subject matter apart from their dependence on claim 1. In particular, the references identified by the Examiner fail to disclose or suggest many of the limitations set forth in the claims.

Claim 2 recites “a second server in communication with said first server over one of said first network and a second network; and, a database that stores said information, said database accessible by said second server.” A set forth above, Utsugi et al. does not expressly or inherently disclose a client-server system—much less a system meeting the particular requirements of the claim. Further, the database identified by the Examiner does not store information regarding orders for manufacture of parts as recited in claim 1. Instead the database stores information relating “supply capacity data of a plurality of associates that supply parts”. See paragraph [0045]. In other words, the database identified by the Examiner in Utsugi et al. stores information relating to each supplier’s ability to fill orders—not information relating to orders for manufacture of parts as recited in the claim.

Claim 4 further recites “a data structure that associates said first completed application with an approval agent, said first server further configured to access said data structure and transmit an application notification to said approval agent upon receipt of

“said completed application.” The Examiner cites paragraph [0030] in Utsugi et al. as disclosing a system meeting this limitation. This paragraph, however, describes the collection of planning data from associates (subcontractors) to enable calculation of an expected shipment date. The cited paragraph does not evidence, in any respect, a data structure that “associates said first completed application with an approval agent” nor the transmission of “an application notification to said approval agent upon receipt of said completed application” as recited in claim 4.

Claim 6 depends from claim 4 and further recites “wherein said application notification includes an electronic link to said first completed application.” The Examiner cites paragraph [0092] in Williams et al. as disclosing a system meeting this limitation. The “links” identified in paragraph [0092], however, are described as simple links to OEM or supplier websites and are not links to a stored “application” for manufacture of vehicle parts as recited in the claim.

Claim 7 further recites “wherein said first server is further configured to transmit an approval notification to said customer client if said information in said first completed application meets predetermined conditions and to transmit an application notification to an approval agent if said information in said first completed application does not meet said predetermined conditions.” The Examiner cites paragraph [0078] in Reichwein et al. as disclosing a system meeting this limitation. The cited paragraph, however, does not disclose or suggest any type of automated approval of requests nor notification to the customer based on predetermined conditions as recited in the claim. Rather, the cited paragraph at most indicates that a customer will receive notices on “events” during handling of the customer’s order. Further, the cited paragraph does not disclose or

suggest routing of the application to an approval agent if predetermined conditions are not met. By contrast, orders placed in the system of Recichwein et al. are simply transmitted to the service technician regardless of condition.

Claim 29 further recites “a manufacturer client in communication with said first server over one of said first network and a second network.” Again, Utsugi et al. does not expressly or inherently disclose a client-server architecture in contrast to the Examiner’s statements.

IV. REJECTION OF CLAIM 3 UNDER 35 U.S.C. § 103(A)

Claim 3 stands rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Williams et al. (U.S. Published Application No. 2003-0055812) and further in view of Giles (U.S. Published Application No. 2005-0138216). Applicants have amended claim 3 to correct an informality. Applicants respectfully submit that the rejection of claim 3 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claim 3, as amended, depends directly from claim 2 and indirectly from independent claim 1 and therefore incorporates all of the limitations set forth in claims 1-2. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 2. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 3

depends from claims 1 and 2, Applicants submit that the rejection of claim 3 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

V. REJECTION OF CLAIMS 10-16 AND 26 UNDER 35 U.S.C. § 103(A)

Claims 10-16 and 26 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Williams et al. (U.S. Published Application No. 2003-0055812) and further in view of Shields et al. (U.S. Published Application No. 2004-0030614). Applicants respectfully submit that the rejection of claims 10-16 and 26 under 35 U.S.C. § 103(a) is improper because the combination of references does not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claims 10-16 and 26 depend from independent claim 1 and therefore incorporates all of the limitations set forth in claim 1. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 10-16 and 26 depends from claim 1, Applicants submit that the rejection of claims 10-16 and 26 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants submit, however, that claims 10-16 and 26 recite patentable subject matter apart from their dependence on claim 1. In particular, the cited references fail to disclose or suggest a system meeting the limitations set forth in many of the claims.

Claim 11 depends from claim 10. Claim 10 recites that the “application interface includes a plurality of tabs.. each tab of said plurality of tabs corresponding to a category of requested information. Claim 11 further recites the limitation “wherein said plurality of tabs are displayed in a plurality of rows, each row of said plurality of rows containing at least two tabs of said plurality of tabs.” The Examiner’s stated rejection of claim 11 appears to stop midstream (Office Action p. 5) and the Examiner has failed to identify where in the cited references a system meeting the limitation of claim 11 is disclosed or suggested. Applicants note, however, that even a cursory review of Figures 2 and 4 (which show tabs in a single row) in Shields et al. demonstrates that Shields et al. do not disclose or suggest a system meeting this limitation.

Claim 12 also depends from claim 10 and further recites “wherein each category of said plurality of categories of requested information includes at least one field and said first server is further configured to generate a notification to said customer when said customer selects a new category of requested information and a value in a field of a previously selected category of requested information fails to meet a predetermined condition.” The Examiner cites paragraph [0115] in Shields et al. as disclosing a system meeting this limitation. Applicants first note that there is no disclosure in Shields et al. regarding the input of information comprising the order or requisition. Rather, Shields et al. describes a system that organizes pre-existing requisition orders for review by buyers. Accordingly, Shields et al. does not even disclose or suggest the system by which the requisitioner (who is analogous to the customer in the claimed invention) places the order. Further, the paragraph cited by the Examiner does not disclose a system for further contact with the requisitioner. Accordingly, Shields et al. does not disclose a server

“configured to generate a notification to said customer” much less generation of the notice responsive to the specific events recited in claim 12.

Claim 13 is also dependent on claim 10 and recites “wherein each category of said plurality of categories of requested information includes at least one field and said first server is further configured to generate a first value for a first field responsive to receipt of a second value for a second field from said customer client.” Again, Shields et al. does not even disclose the system by which the requisitioner places an order (it simply discloses a system for organizing and displaying multiple orders). Accordingly, Sheilds et al. certainly do not disclose or suggest the specific system recited in claim 13 in which values in fields are automatically generated responsive to input values in other fields nor the more specific limitations of claims 14-15.

Claim 26 further recites “wherein said first server is further configured to transmit an approval notification to said customer upon review of said first completed application by an approval agent of said manufacturer.” The Examiner cites paragraph [0054] of Shields et al. as disclosing a system meeting this limitation. The cited paragraph, however, describes information disclosed to a company buyer reviewing requisition orders placed by a requisitioner. The paragraph does not describe transmission of information to the requisitioner (the person analogous to the customer in the claims).

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited in the claims and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claims 10-16 and 26 under 35 U.S.C. § 103(a) is improper.

Accordingly, Applicants request that the rejection of claims 10-16 and 26 under 35 U.S.C. § 103(a) be withdrawn.

VI. REJECTION OF CLAIMS 17-19 UNDER 35 U.S.C. § 103(A)

Claims 17-19 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Williams et al. (U.S. Published Application No. 2003-0055812) and further in view of Muratori et al. (U.S. Published Application No. 2004-0095398). Applicants respectfully submit that the rejection of claims 17-19 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claims 17-19 depend directly from claim 10 and indirectly from independent claim 1 and therefore incorporates all of the limitations set forth in claims 1 and 10. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claim 1 and 10. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claim 17-19 depend from claims 1 and 10, Applicants submit that the rejection of claims 17-19 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants submit, however, that claims 17-19 recite patentable subject matter apart from their dependence on claims 1 and 10. In particular, the cited references fail to disclose or suggest a system meeting the limitations set forth in the claims and again represents non-analogous art..

Claim 17 recites “wherein said application interface includes an indicator indicating, simultaneously for each of said plurality of categories of requested information, whether said first server has received all requested information in said category of requested information.” The Examiner cites paragraph [0044] in Muratori et al. as disclosing a system meeting this limitation. Muratori et al., however, only discloses indicators for indicating the progress of various software programs that are running on a processor. Muratori et al. does not disclose or suggest indicators that indicate the progress of user input of information or, as recited in the claim, “whether said first server has received all requested information in said category of requested information.” Further, Muratori et al. do not disclose or suggest an indicator having “a plurality of members corresponding to said plurality of tabs, said plurality of members ordered in the same manner as said plurality of tabs” as recited in claim 19. Muratori et al. does not disclose any correlation between the indicators and user input tabs.

Muratori et al. is also non-analogous art. Muratori et al. relates to a graphical user interface detailing the progress of software operations on a processor and is clearly unrelated to the receipt of orders for manufacture of vehicle parts. Muratori et al. is also not pertinent to the problems that Applicants were concerned with. Muratori et al. is directed towards assisting with debugging of computer code (paragraph [0002]), a problem far removed from improving efficiency in orders for manufacture of parts.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited claims 17-19 and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claims 17-19 under 35 U.S.C. § 103(a) is improper.

Accordingly, Applicants request that the rejection of claims 17-19 under 35 U.S.C. § 103(a) be withdrawn.

VII. REJECTION OF CLAIMS 21-25 AND 31-33 UNDER 35 U.S.C. § 103(A)

Claims 21-25 and 31-33 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Williams et al. (U.S. Published Application No. 2003-0055812) and further in view of Olson et al. (U.S. Published Application No. 2003-0004825). Applicants respectfully submit that the rejection of claims 21-25 and 31-33 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claims 21-25 and 31-33 depend from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. Claims 31-33 also depend from claim 29 and therefore incorporate all of the limitations set forth in claim 29. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 29. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 21-25 and 31-33 depend from claim 1 (and because claims 31-33 depend from claim 29), Applicants submit that the rejection of claims 21-25 and 31-33 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants submit, however, that claims 21-25 and 31-33 recite patentable subject matter apart from their dependence on claims 1 and 29. In particular, the cited references fail to disclose or suggest a system meeting the limitations set forth in the claims.

Claim 21 recites “wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, an electronic link to a prior application of said customer.” The Examiner cites paragraph [0080] in Olson et al. as disclosing a system meeting this limitation. The cited paragraph, however, describes a system where automated messages are “pushed” to users based on various conditions. There is simply nothing in the cited paragraph to indicate that an electronic link is sent to a customer upon request from the customer client as recited in the claim. Further, there is no disclosure or suggestion in the cited paragraph that the message will include a link to a prior application of the customer. Rather, the messages are described as notices regarding change in status or solicitations.

Claim 23 depends from claim 21 and further recites “wherein said prior application comprises an incomplete application.” The examiner cites paragraph [0067] in Olson et al. as disclosing a system meeting this limitation. The cited paragraph, however, deals with notification and correction of errors during data entry. The cited paragraph does not relate in any way to incomplete applications as recited in the claim and the information is again provided automatically to the user rather than at user request.

Claim 25 depends from claim 21 and further recites “wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, electronic links to prior applications of said customer and to order said electronic links in accordance with one of a plurality of criteria selected by

“said customer through said customer client.” The Examiner again cited paragraph [0080] in Olson et al. as disclosing a system meeting this limitation. As set forth above, the cited paragraph indicates that messages are sent to the user automatically rather than at customer request as recited in the claim. Further, to the extent that the cited paragraph evidences that multiple messages are sent, there is simply no disclosure or suggestion of ordering of the messages—much less ordering based on customer criteria as recited in the claim.

Claims 31-33 all relate to notifications (and ordering of notifications) sent to a manufacturer client after an application has been completed. The Examiner again cites paragraph [0080] in Olson as meeting these limitations. The cited paragraph, however, relates to messages sent to customer users as opposed to manufacturers. Further, there is simply no disclosure or suggestion of a method of ordering multiple messages as recited in claim 33.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited claims 21-25 and 31-33 and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claims 21-25 and 31-33 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicants request that the rejection of claims 21-25 and 31-33 under 35 U.S.C. § 103(a) be withdrawn.

VIII. REJECTION OF CLAIMS 27-28 AND 30 UNDER 35 U.S.C. § 103(A)

Claims 27-28 and 30 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Williams et

al. (U.S. Published Application No. 2003-0055812) and further in view of Shields (U.S. Published Application No. 2004-0030614) and further in view of Olson et al. (U.S. Published Application No. 2003-0004825). Applicants respectfully submit that the rejection of claims 27-28 and 30 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claims 27-28 and 30 depend from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. Claim 27 and claim 30 also depends from claims 26 and 29, respectively, and therefore incorporate all of the limitations set forth in claims 26 and 29, respectively. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1, 26 and 29. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 27-28 and 30 depend from claim 1 (and because claim 27 depends from claim 26 and claim 30 depends from claim 29), Applicants submit that the rejection of claims 27-28 and 30 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants submit, however, that at least claims 28 and 30 recite patentable subject matter apart from their dependence on claims 1 and 29. In particular, the cited references fail to disclose or suggest a system meeting the limitations set forth in the claims.

Claim 28 recites “wherein said first server is further configured to transmit to said customer client, responsive to a request received from said customer client, electronic links to a subset of prior applications of said customer, said subset created responsive to search data provided by said customer.” The Examiner has identified paragraph [0080] in Olson et al. as disclosing a system meeting the recited limitation. Paragraph [0080], however, only discloses the automated transmission of messages “pushed” to users. The cited paragraph does not disclose or suggest transmission of information response to user requests, much less a subset of prior applications of the customer or a creation of a subset responsive to search data provided by the user. There is simply no disclosure or suggestion of these features whatsoever in the cited paragraph.

Claim 30 further recites “wherein said first server transmits an application notification to said manufacturer client upon receipt of said first completed application.” The Examiner again cites paragraph [0080] in Olson as disclosing a system meeting this limitation. The cited paragraph does not identify the parties to which messages are sent, however, and certainly does not disclose the transmission of the particular information recited in the claim (i.e., an application notification).

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited claims 27-28 and 30 and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claims 27-28 and 30 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicants request that the rejection of claims 27-28 and 30 under 35 U.S.C. § 103(a) be withdrawn.

IX. REJECTION OF CLAIMS 5 AND 8-9 UNDER 35 U.S.C. § 103(A)

Claims 5 and 8-9 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Utsugi et al. (U.S. Published App. No. 2002-0099588) in view of Reichwein et al. (U.S. Published Application No. 2002-0040328) and further in view of Williams et al. (U.S. Published Application No. 2003-0055812) and further in view of Brickell et al. (U.S. Published Application No. 2003-0115142). Applicants respectfully submit that the rejection of claims 5 and 8-9 under 35 U.S.C. § 103(a) is improper because the combination of references do not disclose or suggest all of the limitations in the claims and because there is no suggestion or motivation to combine the teachings of the cited references.

Claims 5 and 8-9 depend from independent claim 1 and therefore incorporate all of the limitations set forth in claim 1. Claim 5 also depends from claim 4 and therefore incorporate all of the limitations set forth in claim 4. As set forth hereinabove, Applicants submit that the combination of references cited by the Examiner fails to disclose or suggest all of the limitations recited in claims 1 and 4. Applicants also submit that there is no suggestion or motivation to combine the teachings of the references cited by the Examiner. Accordingly, at least because claims 5 and 8-9 depend from claim 1 (and because claim 5 depends from claim 4), Applicants submit that the rejection of claims 5 and 8-9 under 35 U.S.C. § 103(a) is improper and request that the rejection be withdrawn.

Applicants submit, however, that claims 5 and 8-9 recite patentable subject matter apart from their dependence on claims 1 and 4. In particular, the cited references fail to disclose or suggest a system meeting the limitations set forth in at least some of the

claims and there is no suggestion or motivation to combine the teachings of Brickell et al..

Applicants submit that there is no suggestion or motivation to combine the teachings of Brickell et al. with the other references because Brickell et al. is again non-analogous art that one of ordinary skill in the art would not have looked to in arriving at the claimed invention. Brickell et al. is again outside the field of invention and not pertinent to the problem with which Applicants were concerned. Brickell et al. relates to the field of system user authentication rather than the receipt of manufacturing orders for vehicle parts. Further, Brickell et al. is directed towards solving the problem of developing a flexible security system for new technologies rather than efficient handling of orders for manufacture of parts. See Brickell et al. para. [0005]. Applicants further note that the Examiner has not set forth any suggestion or motivation to combine Brickell et al. within the Office Action.

In addition to the lack of a suggestion or motivation, Brickell et al. also fails to disclose or suggest limitations set forth in the claims. For example, claim 5 recites “wherein said data structure associates said application with said approval agent based on an identity of said customer.” The Examiner cites paragraph [0035] in Brickell et al. as disclosing a system meeting this limitation. Paragraph [0035], however, simply discloses the entry of various types of authentication information for an individual into a database. The paragraph has nothing to do with the claimed invention and simply does not disclose or suggest a data structure that associates an application with an approval agent, much less one that does so based on the identity of a customer.

Because the combination of references cited by the Examiner does not disclose or suggest all of the limitations recited claims 5 and 8-9 and because there is no suggestion or motivation to combine the teachings of the cited references, Applicants respectfully submit that the rejection of claims 5 and 8-9 under 35 U.S.C. § 103(a) is improper. Accordingly, Applicants request that the rejection of claims 5 and 8-9 under 35 U.S.C. § 103(a) be withdrawn.

X. CONCLUSION

For the above cited reasons, all of the claims presently pending in this application are believed to be allowable. If the Examiner has any further questions or concerns, the Examiner is invited to contact the Applicant's undersigned attorney.

Respectfully submitted,


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